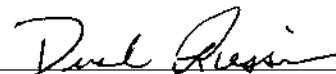


IN THE IOWA DISTRICT COURT IN AND FOR JOHNSON COUNTY

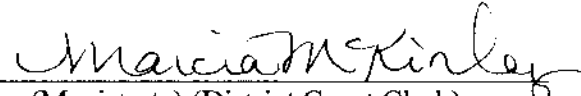
STATE OF IOWA, Plaintiff, v. ROY CARL BROWNING JR., Address: 114 Green Mountain Dr. Iowa City, IA 52245 DOB: April 27, 1952 Defendant.	DCI Case No. 2019-009335 Criminal No. COMPLAINT
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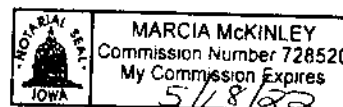
STATE OF IOWA)
) ss.
JOHNSON COUNTY)

I, Derek Riessen, being first duly sworn on oath or on affirmation, accuse **ROY CARL BROWNING JR.**, the Defendant, of the crime of **MURDER IN THE FIRST DEGREE** committed as follows: The said defendant, having malice aforethought, on or about **APRIL 5, 2019**, did willfully, deliberately, and with premeditation kill **JOELLEN WALL BROWNING**, in the county of Johnson and State of Iowa in violation of Iowa Criminal Code Sections 707.1 and 707.2(1).


COMPLAINANT
Address: 22365 20th Ave
Stockton, IA 52769

Subscribed, sworn and acknowledged before me by Derek Riessen, Complainant, this 28th
day of October, 2019.


(Magistrate) (District Court Clerk)
(District Court Clerk's Deputy)
(Notary Public)



AFFIDAVIT OF PROBABLE CAUSE

STATE OF IOWA, COUNTY OF JOHNSON, SS:

I, S/A Derek Riessen of the Iowa Division of Criminal Investigation, state the following facts known by me or told to me by other reliable persons, form the basis for my belief that the Defendant committed the crime of MURDER in the 1st degree:

On Friday, April 5, 2019, at 6:59 am, a 911 call was made by ROY CARL BROWNING JR. who reported finding his wife, JOELLEN BROWNING, age 65, unresponsive. First responders found her deceased lying on her bedroom floor at her residence located at 114 Green Mountain Drive in Iowa City, Johnson County, IA at 7:07 AM. An autopsy showed she had been stabbed multiple times in the front and back of her torso and on her left hand. The forensic pathologist of the University of Iowa Decedent Care Center determined the cause of death was sharp force injuries and the manner was homicide.

Investigators did not find any signs of forced entry into the home. Blood evidence was found in areas in the home include outside the master bedroom and in the master bedroom shower. This evidence, along with evidence obtained at the autopsy, was collected by the Iowa City Police Department's Crime Scene Team and was submitted to the Iowa DCI Laboratory in Ankeny, IA for testing. Results from testing indicated the presence of blood on the right hand nail clippings of JOELLEN BROWNING, which showed a mixture of DNA from two individuals. Assuming the DNA presence of JOELLEN BROWNING, the partial profile of the second contributor belongs to ROY BROWNING. The probability of finding this profile in a population of unrelated individuals, chosen at random, would be less than 1 out of 310 trillion.

The DNA report showed JOELLEN BROWNING'S profile was discovered in blood on the front storm door handle of the home and in the bathroom shower of her home.

Photographs of multiple apparent banking records of JOELLEN BROWNING and ROY BROWNING found at their home were compared to known records of the banks. There were numerous discrepancies between the documents, including a listing of a non-existent account in the photographed record. Another discrepancy in an account owned by JOELLEN and ROY BROWNING showed an account balance of \$97,830.17 in the photographed apparent statement, dated December 31, 2018. The records provided by financial institution for the same account showed an actual balance of \$88.76 for the same statement period. The photographed statement was also missing the line "Interest Paid This Year". Further review of the actual bank account showed the money was removed from this joint account and placed into an account owned solely by ROY BROWNING.

A review of the cellular phones and email accounts belonging to ROY and JOELLEN BROWNING showed an email dated April 1, 2019 at 12:01 pm, sent from JOELLEN to ROY. In the email JOELLEN was questioning ROY as to why there were discrepancies in their bank accounts. In this email, JOELLEN instructed ROY to contact their financial representative and make sure ROY could log on to the account so the BROWNING'S could review those accounts that night.

While reviewing cellular records, investigators discovered a text message sent from JOELLEN to ROY at 1:17pm on April 4, 2019, informing him of the meeting JOELLEN had scheduled for them with their financial institution. JOELLEN asked ROY if he knew that they were able to meet with the institution on Friday April 5, 2019 at 8am. On April 4, 2019 at 1:33pm, Roy responded, "Yes" to JOELLEN, indicating he was aware of the meeting.

On April 4, 2019 ROY BROWNING went to an area paint supply store and purchased rubber palmed nitrile gloves, a package of six white towels and was given 8-10 latex gloves free of charge. The paint store only sold latex gloves in boxes of 100 and ROY BROWNING had stated he didn't want that many so the employee just gave ROY BROWNING a few gloves from behind the desk. The employee provided the receipt for this purchase to investigators, which was dated April 4, 2019 at 1:51 pm. Video footage in the area of the store showed a vehicle matching ROY BROWNING'S, driving past the camera on April 4, 2019 at approximately 2:02 pm.

Multiple searches were conducted, beginning on April 5, 2019 and continued for the next several days of the BROWNING residence, vehicles, business and person and at no time did investigators locate the items determined to have been purchased by ROY BROWNING at the paint supply store.

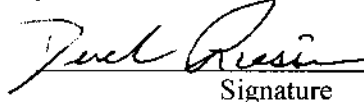
Records showed that ROY BROWNING took out separate loans for \$4,000 on four different occasions from an Illinois area title and loan company. Each loan had an interest rate of 304.17%. The last loan was paid off on April 2, 2019. Investigators found that ROY BROWNING informed the title company on February 13, 2018, they were not to contact his wife, JOELLEN BROWNING, regarding the title loan.

A representative of the financial institution used by the BROWNING'S, was scheduled to meet on Friday, April 5, 2019 at 8:00 AM with JOELLEN and ROY BROWNING. The meeting reportedly was set because JOELLEN was preparing for tax season and had found some problems with ROY and JOELLEN'S accounts and wanted to meet with the representative in order to figure things out. The representative was prepared to tell JOELLEN at this meeting that one of their savings accounts was depleted and ROY had taken out loans of which JOELLEN was not aware. The representative was prepared to tell JOELLEN that an account JOELLEN thought was active never actually existed.

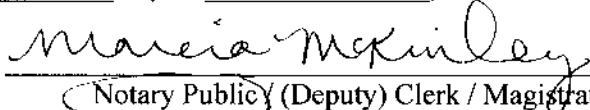
While reviewing credit card records in a credit card in the name of JOELLEN BROWNING, investigators noticed one of the credit cards had a balance of \$17,643.86 according to the March 7 – April 6, 2019 statement. The following month's statement, April 7 – May 6, 2019, revealed that a payment of \$17,643.86 was made by phone on April 12, 2019, to the credit card company from ROY BROWNING'S individual checking account. The credit card statement also showed this credit card was continuing to be used even after JOELLEN'S funeral on April 11, 2019.

JOELLEN BROWNING had a retirement account and life insurance policy worth in excess of \$2 million. In reviewing finances, records show that JOELLEN BROWNING was financially stable and ROY BROWNING did not have a revenue source.

The above crime occurred in Iowa City, IA which is located in Johnson County and the State of Iowa.


Signature

Subscribed and sworn to before me on this 28th day of October, 2019


Notary Public (Deputy) Clerk / Magistrate

